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17 Attorneys for Plaintiff

18 PRN Health Services, LLC

19 **UNITED STATES DISTRICT COURT**
20 **CENTRAL DISTRICT OF CALIFORNIA**

21 PRN HEALTH SERVICES LLC, a

22 Wisconsin limited liability company

23 Plaintiff,

24 vs.

25 SUBLIME HEALTH SOLUTIONS,

26 LLC., a California limited liability

27 company,

28 Defendant.

CASE NO. 8:24-cv-02560

**NOTICE OF MOTION AND
MOTION FOR DEFAULT
JUDGMENT**

Hearing Date: March 17, 2025

Hearing Time: 8:30 a.m.

Courtroom 10A

Hon. David O. Carter

1 Plaintiff, through counsel, moves this Court for entry of default judgment under
2 Federal Rule of Civil Procedure 55(b)(2) against Defendant, Sublime Health Solutions,
3 LLC, for trademark infringement under the U.S. Lanham Act, 15 U.S.C. § 1052 *et seq.*
4 Plaintiff seeks permanent injunctive relief and the recovery of costs for this lawsuit. In
5 support of this Motion, Plaintiff provides a Memorandum of Points and Authorities, and
6 the Declaration of John T.D. Bathke.
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8

9 **PLEASE TAKE NOTICE** that on March 17, 2025, at 8:30 a.m., Plaintiff, PRN
10 Health Services LLC, through counsel will present this Motion for Entry of Default
11 Judgment before this Court, which is located at the Ronald Reagan Federal Building
12 and United States Courthouse 411 West Fourth Street, Courtroom 10A, Santa Ana, CA
13 92701.
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16
17 DATED: January 17, 2025

Respectfully submitted,

18 PHILLIPS & BATHKE, P.C.

19 /s/John T.D. Bathke

20 John T.D. Bathke

21 Attorney for Plaintiff

22 PRN Health Services LLC
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CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that on January 17, 2025, I electronically filed the foregoing document with the clerk of court for the U.S. District Court, Central District of California, using the electronic case filing system of the court.

I further certify that on January 17, 2025, I caused a copy of the attached document to be served via First Class U.S. mail to the addressee shown below:

Sublime Health Solutions, LLC
2414 S Fairview St., Suite 215
Santa Ana, CA 92704

DATED: January 17, 2025

By: /s/ John T.D. Bathke
John T.D. Bathke